

Commonwealth of Kentucky
Division for Air Quality
PERMIT STATEMENT OF BASIS

CONDITIONAL MAJOR DRAFT PERMIT NO. F-06-017

Leggett Partners, L.P.

Simpsonville, Kentucky

March 23, 2006

ELAHE HOUSHMAND

PLANT I.D. #21-211-00019

A.I. NUMBER: 3952

ACTIVITY NUMBER: APE20020001

DESCRIPTION:

Leggett Partners, L.P., coats components for chairs at the Simpsonville, Kentucky plant. The parts are washed in a phosphoric acid based solution. Parts are then hung on hooks and dipped in paint. They are dried in a bake oven. The hooks used in dipping are periodically loaded into a pyrolytic burn-off oven to remove accumulated paint. A separate waxing process is used to coat non-painted parts to prevent rusting.

The source has submitted a permit application to renew their existing Title V permit. In the submitted application, source stated that they are going to switch to a non - HAP coating. Facility has also requested that enforceable limits be placed on their actual VOC emissions so that VOC potential emissions stays below major source threshold.

Due to the facts stated above, the Division has decided not to renew the Title V permit # V-97-048 (Revision 1) and instead issue a conditional major source permit # F-06-017 with VOC emission limitation of 50 tons per year.

In addition as stated in a letter from the facility dated December 12, 2005, the source will no longer be using the Aquar Mar coating that requires the addition of ammonia. This eliminates the odor problems at the facility.

TYPE OF CONTROL AND EFFICIENCY:

The most significant source of potential emissions is the paint dip tank. There is no control for VOCs so it is assumed that all VOCs are emitted to the atmosphere.

EMISSION FACTORS AND THEIR SOURCE:

MSDS, Engineering Calculations and AP-42

Applicable Regulations:

401 KAR 59:010, New Process Operation, is applicable to each affected facility or source, associated with process operations, which are not subject to another emission standard with respect to particulate matter emissions commenced after July 2, 1975.

40 CFR 60, Subpart EE, Standards of Performance for Surface Coating of Metal Furniture (applicable to each affected facility commenced on or after November 28, 1980).

EMISSION AND OPERATING CAPS DESCRIPTION:

40 CFR 60, Subpart EE, VOC emissions will be controlled within the constraints of regulation of 40 CFR 60, Subpart EE by controlling the formulation of paint used so that VOC content is less than 0.90 Kg per Liter of coating solids applied. The owner or operator shall submit a written report every calendar quarter of each instance in which the volume-weighted average of the total mass of VOC's emitted to the atmosphere per volume of applied coating solids is greater than 0.9 kilogram per liter of coating solids applied. If no such instances have occurred during a particular quarter, a report stating this shall be submitted semiannually.

Conditional Major Emission Limitation

Source-wide VOC emissions shall not exceed fifty (50) tons during any consecutive twelve (12) month period.

401 KAR 59:010, New process operations, Section 3

1. Visible emissions shall not equal or exceed 20% opacity for each applicable process.
2. Particulate matter emissions shall not exceed 2.34 pounds/hour for each applicable process.

CREDIBLE EVIDENCE:

This permit contains provisions which require that specific test methods, monitoring or recordkeeping be used as a demonstration of compliance with permit limits. On February 24, 1997, the U.S. EPA promulgated revisions to the following federal regulations: 40 CFR Part 51, Sec. 51.212; 40 CFR Part 52, Sec. 52.12; 40 CFR Part 52, Sec. 52.30; 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12, that allow the use of credible evidence to establish compliance with applicable requirements. **At the issuance of this permit, Kentucky has only adopted the provisions of 40 CFR Part 60, Sec. 60.11 and 40 CFR Part 61, Sec. 61.12 into its air quality regulations.**